

EXHIBIT 34

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:  
The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.

Case No. 18-OP-45090 (N.D. Ohio)

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Videotaped Deposition of

KENNETH R. BALL II

November 7, 2018
9:04 a.m.

Taken at:

Hilton Garden Inn
1307 East Market Street
Akron, Ohio

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1 the question.

2 A. That could happen.

3 Q. Okay. So it's -- I think, as you
4 said, certainly plausible that individuals who
5 end up overdosing on an opioid never intended
6 to take one, right?

7 MR. LEDLIE: Object to the form of
8 the question.

9 A. That could be the case.

10 Q. All right. We've talked about the
11 opioid epidemic and your understanding of it.

12 Do you believe that Akron faces a
13 prescription opioid epidemic?

14 MR. LEDLIE: Object to the form of
15 the question.

16 A. I do.

17 Q. And when did that prescription
18 opioid epidemic begin, in your opinion?

19 A. I believe that it -- that it
20 started in -- like I had mentioned before, in
21 the late '90s when we started to see a
22 significant number of -- of reports and other
23 interactions that suggested that.

24 - - - - -

25 (Thereupon, Deposition Exhibit 6,

1 because they're computer-generated reports.

2 Q. Do you recall discussing, with your
3 leadership at the time, that you were seeing
4 these increases?

5 MR. LEDLIE: Object to the form of
6 the question.

7 A. I don't recall specifically. I do
8 know that there was a change in -- in awareness
9 about -- hadn't heard of OxyContin. Hear of
10 OxyContin, and then start to see another
11 report, another report, another report, and,
12 you know, Percocet and some of the other
13 prescription medications, then, that were
14 frequently being reported as stolen or stolen,
15 it stood out.

16 Q. Right. And I -- and I just want to
17 understand. I know it stood out to you. Are
18 you aware that it stood out to others as well?

19 A. Through -- yes. I mean, through
20 casual conversations that I wouldn't be able to
21 pinpoint, you know, "I spoke to Sergeant
22 Jones," you know, "on this date about it."
23 But, yes, there was a growing familiarity
24 within the department that that was
25 problematic.

1 Q. Starting in the late 1990s?

2 A. I think so.

3 Q. Okay. Have you ever sought a
4 budget allowance specific to anything caused by
5 opioids?

6 A. Can you restate that?

7 Q. Sure. Have you ever -- have you
8 ever asked for any kind of a specific budget
9 allowance related to opioids in any way?

10 MR. LEDLIE: Object to the form.

11 A. No, other than people resources,
12 I've not had a financial request.

13 Q. You say "other than people
14 resources." Have you asked for specific people
15 resources related to opioids?

16 A. Yes.

17 Q. Tell me about that.

18 A. The first two -- this wasn't me
19 asking at that point in time, but the -- the
20 first two detectives that were dedicated, they
21 were taking from our -- taken from our
22 narcotics or bid, in addition to our current --
23 the staffing at that time for narcotics, two
24 positions for opioid death investigations.

25 Then there was another point that